UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Criminal No. 16-204 (PJS/SER)

UNITED STATES OF AMERICA,

Plaintiff,

INFORMATION

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18 U.S.C. § 2252(a)(2) 18 U.S.C. § 2252(b)(1) 18 U.S.C. § 2253(a)

JESSE DUANE JACOBS,

Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT:

BACKGROUND

On or about August 12, 2015, in the State and District of Minnesota, the defendant, JESSE DUANE JACOBS, knowingly and intentionally possessed in an electronic format approximately 385 digital images files and 45 digital video files of known minors engaging in sexually explicit conduct, all of which he had obtained from the Internet, mainly through peer-to-peer file-sharing programs. JESSE DUANE JACOBS maintained the images and digital video files on the hard drives of his computers and on several digital storage devices.

COUNT 1 (Receipt of Child Pornography)

On or about June 10, 2015, in the State and District of Minnesota, the defendant,

JESSE DUANE JACOBS,

having been previously convicted under the laws of the State of Minnesota relating to possession of child pornography, did knowingly receive a visual depiction using a means

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and facility of interstate and foreign commerce and that had been mailed, shipped and transported in interstate and foreign commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit, a computer video file titled "Sweet Lil' 11 Webcam Collection Mixed Girls 5 (Eyecan).mp4," which is approximately 30:49 minutes long and is a compilation of approximately 15 distinct video clips depicting female children dancing, posing, removing some or all of their clothing, exposing their genitalia, spreading their labias, sexually penetrating themselves with foreign objects, and masturbation, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

FORFEITURE ALLEGATIONS

Count 1 of this Information is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction of the foregoing offense, the defendant,

JESSE DUANE JACOBS,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction,

which was produced, transported, mailed, shipped or received in violation of Chapter 110

of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or

other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to

promote the commission of such offense or any property traceable to such property,

including but not limited to: one Acer Laptop ES-521 with serial number

NXMLFAA0124350F03B3400; one E-Machine desktop computer with serial number

PTNBG02002016138422701; one 256 MB SANDISK SD Card, no serial number; and

one PNY USB 3.0 32GB Thumb Drive, no serial number.

If any of the above-described forfeitable property is unavailable for forfeiture, the

United States intends to seek the forfeiture of substitute property as provided for in Title

21, United States Code, Section 853(p), as incorporated by Title 18, United States Code,

Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(2),

2252(a)(4)(B), 2252(b)(1), 2252(b)(2), and 2253(a).

Dated: January 11, 2017

ANDREW M. LUGER

United States Attorney

BY: KATHARINE T. BUZICKY

Assistant U.S. Attorney

Attorney ID No. 671031MA

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